

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

ANDREW ALEXANDER, et al.

PLAINTIFFS

VS.

CIVIL ACTION NO. 4:20-CV-21-SA-JMV

PELICIA E. HALL, et al.

DEFENDANTS

**DEFENDANTS’ RULE 702 AND *DAUBERT* MOTION TO EXCLUDE
THE EXPERT TESTIMONY AND REPORT OF JONATHAN S. SHEFFTZ**

Defendants Pelicia Hall, Tommy Taylor, Jeworski Mallett, Brenda Cox, Timothy Morris, Lee Simon, Marylen Sturdivant, Wendell Banks, Verlana Flagg, Jewel Morris, Leather Williams, Earnest King, Laquitta Meeks, Stanley Flagg, Claude Lee, Peggy Lathan, Olivia Westmoreland, Caren Webb, Terry Haywood, Audrey Fields, and Marshal Turner (“Defendants”) submit this motion to exclude the testimony, report, and supplemental report of Plaintiffs’ damages expert Jonathan S. Shefftz.

In support, Defendants rely upon their accompanying memorandum in support, and the following exhibits:

Exhibit 1 – Shefftz Report

Exhibit 2 – Shefftz Supplemental Report

Exhibit 3 – Cross Report

Exhibit 4 – Shefftz’s “Award” Cases

Exhibit 5 – *Measuring Violations of Human Rights: An Empirical Analysis of Awards in Respect of Non-Pecuniary Damage under the European Convention on Human Rights*

For the reasons stated in Defendants’ memorandum, Defendants respectfully request that the Court exclude from evidence the testimony, report, and supplemental report of Plaintiffs’ damages expert Jonathan S. Shefftz. Defendants request such other and further relief as the Court

deems just and proper.

Dated: December 26, 2023.

Respectfully submitted,

**MARSHAL TURNER, PELICIA HALL,
TOMMY TAYLOR, JEWORSKI MALLETT,
BRENDA COX, TIMOTHY MORRIS, LEE
SIMON, MARYLEN STURDIVANT,
WENDELL BANKS, VERLENA FLAGG,
JEWEL MORRIS, LEATHER WILLIAMS,
EARNEST KING, LAQUITTA MEEKS,
STANLEY FLAGG, CLAUDE LEE, PEGGY
LATHAN, OLIVIA WESTMORELAND,
CAREN WEBB, TERRY HAYWOOD,
AUDREY FIELDS, all in their individual
capacities**

By: /s/ Cody C. Bailey
One of Defendants' Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on December 26, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Cody C. Bailey
Cody C. Bailey